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October 9, 2002

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## VIA HAND DELIVERY EX PARTE OR LATE FILED

OCT - 9 2002

Ms. Marlene H. Dortch Secretary Federal Communications Commission 445 – 12th St., SW Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY

Re: Triton PCS License Company, L.L.C.

Notification of E911 Technology Change for its

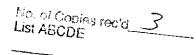
GSM Network

CC Docket No. 94-102

Dear Ms. Dortch:

Pursuant to the Commission's Public Notice released September 14, 2000, <sup>1</sup> Triton PCS License Company, L.L.C. ("Triton"), by its attorneys, hereby notifies the Commission of its decision to change the Phase II E911 technology it will use for its GSM network from the E-OTD handset-based technology it reported to the Commission previously<sup>2</sup> to a network-based technology using the Grayson TDOA/AOA equipment Triton is using to provide E911 service for its TDMA network. This change does not affect Triton's plans for its existing TDMA network. Further details regarding this change will be provided in Triton's next quarterly report on its Phase II E911 deployment, which is due November 1.<sup>3</sup>

<sup>&</sup>lt;sup>3</sup> See Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Order to Stay, CC Docket No. 94-102 (rel. July 26, 2002) at ¶ 28.



<sup>&</sup>lt;sup>1</sup> Wireless Telecommunications Bureau Provides Guidance on Carrier Reports on Implementation of Wireless E911 Phase II Automatic Location Identification, *Public Notice*, CC Docket No. 94-102, DA 00-2099 (rel. Sept. 14, 2000) at 3 (citing Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, *Third Report and Order*, 14 FCC Rcd 17388, 17428 (1999) at ¶ 89).

<sup>&</sup>lt;sup>2</sup> See Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Triton PCS License Company, L.L.C. Status Report and Revised Petition for Waiver of the E911 Phase II Location Technology Implementation Rules, CC Docket No. 94-102 (filed Nov. 30, 2001) at 18-20. See also Letter from J.G. Harrington, counsel for Triton PCS License Company, L.L.C. to Marlene H. Dortch, Esq., Secretary, Federal Communications Commission, CC Docket No. 94-102 (April 22, 2002), at 3.

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Please inform us if any questions should arise in connection with this notification.

Respectfully submitted,

J.G. Harrington Christina H. Burrow

Counsel for Triton PCS License Company, L.L.C.

CH:car2

cc: Blaise A. Scinto, Wireless Telecommunications Bureau

Patrick Forster, Wireless Telecommunications Bureau

Jennifer B. Tomchin, Wireless Telecommunications Bureau